



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

January 15, 2021

**VIA ECF**

The Honorable John P. Cronan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Moukhitdinov, et al. v. United States of America*, 20 Civ. 9269 (JPC)

Dear Judge Cronan:

This Office represents defendant United States of America (the “Government”) in the above-referenced tax refund action, in which the plaintiff challenges the Government’s disallowance of the deduction of mortgage interest and real estate taxes for tax year 2013. ECF No. 7. The parties are currently required to file a joint letter and proposed case management plan and scheduling order by January 27, 2021. *See* ECF No. 8. In addition, the initial pretrial conference in this matter is currently scheduled for February 3, 2021 at 10:30 a.m. *Id.* Furthermore, the Government’s response to the plaintiff’s complaint is due January 22, 2021. I write on behalf of both parties to respectfully request an extension of time of 45 days—from January 27, 2021 to March 15, 2021—to file a joint letter and proposed case management plan and scheduling order, and to request a 45 day adjournment—from February 3, 2021 to March 22, 2021 (or a later date that is more convenient for the Court)—of the initial pretrial conference. This is the parties’ first request for an extension of time and adjournment. In addition, with the plaintiff’s consent, I write respectfully to request a 45 day extension of the Government’s time to respond to the complaint, from January 22, 2021, until March 8, 2021. This is the Government’s first request for an extension of time to respond to the complaint.

The extensions and adjournment are respectfully requested to allow the plaintiff to provide particular documentation to the Government regarding the deduction at issue, which the parties have discussed and believe could result in a consensual resolution of this case. Therefore, the parties respectfully submit that the proposed extensions and adjournment would promote the interests of judicial efficiency and conservation of resources.

Accordingly, we respectfully request that the Court extend the parties’ deadline to file a joint letter and proposed case management plan and scheduling order to March 15, 2021, and to adjourn the initial pretrial conference to a date on or after March 22, 2021. In addition, I respectfully request that the Court extend the Government’s deadline to file a response to the complaint to March 8, 2021.

We thank the Court for its consideration of this submission.

Respectfully,

AUDREY STRAUSS  
Acting United States Attorney

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cc: Dewey Golkin, Esq. (by ECF)  
Counsel for Plaintiff

Defendant's request is GRANTED. The Initial Pretrial Conference scheduled for February 3, 2021, at 10:30 a.m. is hereby adjourned to April 1, 2021, at 1:00 p.m. Unless the Court directs otherwise, the Court plans to conduct the conference by teleconference. At the scheduled time, counsel for all parties should call (866) 434-5269, access code 9176261. Accordingly, the parties' deadline to file a joint letter and proposed Case Management Plan is extended to March 25, 2021.

Further, the Court extends Defendant's deadline to respond to the Complaint to March 8, 2021.

SO ORDERED.

Date: January 15, 2021  
New York, New York

  
JOHN P. CRONAN  
United States District Judge